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**From:** Cirian, Mike [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=98D0FD2CBB3F4F25B819C6929E18D08D-CIRIAN, MIKE]  
**Sent:** 11/2/2018 2:46:39 PM  
**To:** Gunnar Emilsson [EmilssonGR@cdmsmith.com]  
**Subject:** FW: CFAC RI/FS AOC Schedule Modification and AOC Amendment 2  
**Attachments:** CFAC RIFS Work Plan Table 3 - Schedule of Deliverables and Activities\_Clean.docx; CFAC RIFS Work Plan Table 3 - Schedule of Deliverables and Activities\_Redline.docx

FYI

Mike Cirian, PE  
Libby On-site Project Manager  
US EPA  
108 East 9th Street  
Libby, MT 59923  
(406) 293-6194 Office

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**From:** Sloan, Richard <RSloan@mt.gov>  
**Sent:** Friday, November 2, 2018 8:28 AM  
**To:** Cirian, Mike <Cirian.Mike@epa.gov>  
**Cc:** Balliew, Carolina <Carolina.Balliew@mt.gov>; Morris, Katie <Katie.Morris@mt.gov>  
**Subject:** FW: CFAC RI/FS AOC Schedule Modification and AOC Amendment 2

Mike,  
The DEQ supports these efforts to expedite the RIFS.  
The proposed changes are not expected to negatively impact the quality of the RIFS or the effectiveness of the final remedial action.  
Please contact me if you want to discuss.  
Thank you.  
Dick Sloan

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**From:** Laura Jensen [mailto:[ljensen@rouxinc.com](mailto:ljensen@rouxinc.com)]  
**Sent:** Wednesday, October 31, 2018 8:08 AM  
**To:** Cirian, Mike <[Cirian.Mike@epa.gov](mailto:Cirian.Mike@epa.gov)>  
**Cc:** Emilsson, Gunnar <[EmilssonGR@cdmsmith.com](mailto:EmilssonGR@cdmsmith.com)>; John.Stroiazso@glencore.ca; Steve Wright - CFAC <[swright@cfaluminum.com](mailto:swright@cfaluminum.com)>; Sloan, Richard <[RSloan@mt.gov](mailto:RSloan@mt.gov)>; Andrew Baris <[abaris@rouxinc.com](mailto:abaris@rouxinc.com)>; Michael Ritorto <[mritorto@rouxinc.com](mailto:mritorto@rouxinc.com)>  
**Subject:** CFAC RI/FS AOC Schedule Modification and AOC Amendment 2

Mr. Cirian,

As discussed during the October 17, 2018 project update meeting for the CFAC RI/FS, Roux on behalf of CFAC is requesting a modification to Table 3 in the CFAC RI/FS Work Plan titled "RI/FS Schedule of Deliverables and Activities."

Roux understands that USEPA and CFAC would like to work together to identify efficiencies in the RI/FS Schedule with the ultimate goal of moving up the completion date of the RI/FS. In response to this goal, CFAC/Roux are requesting to advance the completion date of the RI/FS by completing the Draft Candidate Technologies and Remedial Alternatives Memorandum as part of the draft Feasibility Study Work Plan, rather than a standalone document. Combining these two Feasibility Study related items reduces the overlap production time for each document

and also reduces the need for EPA review and comment on one additional document. It is anticipated that this change can reduce the schedule by approximately 3 months.

The Candidate Technologies and Remedial Alternatives Memorandum and Feasibility Study Work Plan overlap in many facets of their content, specifically, in the listing and identifying of technologies required for alternative analysis in the context of potential remedial alternatives. A modified Table 3 presenting the proposed change (a redline version and clean version) is attached to this e-mail.

The RI/FS Work Plan and thus the RI/FS Schedule in Table 3 is included as part of the Administrative Settlement Agreement and Order on Consent (AOC) between the USEPA and CFAC dated November 30, 2015. Therefore, CFAC views this proposed modification as a modification to the AOC. In accordance with Section XXIX of the AOC (i.e., EFFECTIVE DATE AND SUBSEQUENT MODIFICATION), CFAC has reached out to EPA counsel to discuss an Amendment 2 to the AOC. In addition to making the necessary change to the Schedule, CFAC is discussing with EPA counsel modifying the AOC to give the EPA RPM authority to approve mutually agreeable schedule changes and changes to the RI/FS Work Plan in the future.

Please contact me if you have any questions or would like to discuss this request in more detail. Thank you.

**Laura Jensen, P.G. – NY | Project Hydrogeologist**

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